**MEMO ENDORSED**

**MICHAEL A. CARDOZO**  
Corporation Counsel

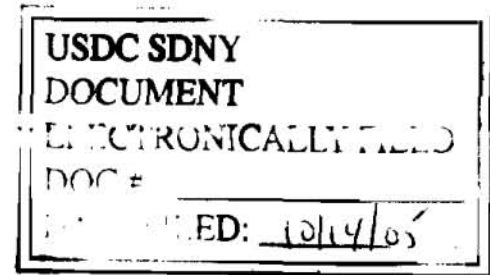
THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

**JAMES MIRRO**  
Special Assistant Corporation Counsel  
phone (212) 788-8026 fax (212) 788-9776

October 7, 2005

**BY FIRST CLASS MAIL**

The Honorable Kenneth M. Karas  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 920  
New York, New York 10007-1312



**Re: Coburn, et al. v. The City of New York, et al. (05 CV 7623 (KMK))**  
**Sloan, et al. v. The City of New York, et al. (05 CV 7668 (KMK))**  
**Sikelianos, et al. v. The City of New York, et al. (05 CV 7673 (KMK))**  
**Huffman, et al. v. The City of New York, et al. (05 CV 7671 (KMK))**  
**Bastidas, et al. v. The City of New York, et al. (05 CV 7670 (KMK))**  
**Oehl, et al. v. The City of New York, et al. (05 CV 7625 (KMK))**  
**Jarick, et al. v. The City of New York, et al. (05 CV 7626 (KMK))**  
**Galitzer, et al. v. The City of New York, et al. (05 CV 7669 (KMK))**  
**Phillips, et al. v. The City of New York, et al. (05 CV 7624 (KMK))**  
**Carney, et al. v. The City of New York, et al. (05 CV 7672 (KMK))**

Dear Judge Karas:

I am a Special Assistant Corporation Counsel with the City of New York and I write in connection with the cases captioned above, all of which arise from arrests made during the Republican National Convention and were recently filed by plaintiffs' counsel Jeffrey A. Rothman.

On or about September 23, 2005, the City was served with the Complaints in each of these cases. We calculate that answers are due on or about October 13, 2005. The City respectfully requests additional time to investigate the allegations of these Complaints. The Complaints name numerous individual plaintiffs and numerous named and unnamed ("John Doe") defendants. We believe that records of the underlying criminal actions against the plaintiffs, including police records, have been sealed pursuant to New York Criminal Procedure Law § 160.50. We have forwarded to plaintiffs' counsel requests for authorization for the release of sealed records, so that defendants can access the information, properly assess the cases, and respond to the Complaints.

For the foregoing reasons, the City requests a sixty day enlargement of time in which to answer for defendants in each of these cases, which would make these answers due on December 12, 2005. Counsel for the plaintiffs kindly has consented to this request. The City has agreed to provide plaintiffs in these cases the discovery necessary to permit plaintiffs to participate in the consolidated discovery contemplated for this fall in the RNC cases pending before you. The City has not previously requested an extension of time to answer these Complaints. If this meets with your approval, would you kindly "so order" it?

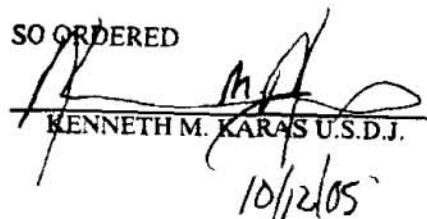
Very truly yours,

  
James Mirro

cc: Jeffrey A. Rothman, Esq. (by fax)

Defendants are given until December 12, 2005 to answer or otherwise respond to the complaint in each case. No further extensions will be granted absent extraordinary and unforeseen circumstances.

SO ORDERED

  
KENNETH M. KARAS U.S.D.J.  
10/12/05